

The Epstein Law Firm, P.A.

340 West Passaic Street
Rochelle Park, New Jersey 07662
www.theepsteinlawfirm.com

Tel (201) 845-5962
Fax (201) 845-5973

Barry D. Epstein *
Michael J. Epstein * ∇
April M. Gilmore * ∇

Michael A. Rabasca ∇
Jeffrey B. Richter

*Certified by the Supreme Court of
New Jersey as a Civil Trial Attorney
∇ Also Admitted in New York

Hon. John E. Selser (Ret.)
Counsel

April 19, 2021

Via ECF

Hon. James B. Clark, III, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

***Re: Collick et al. v. William Paterson University et
al.
Docket No. 16-471 (KM)***

Dear Judge Clark:

As Your Honor knows, this office represents plaintiffs in the above matter. Currently pending before the Court is defendants' motion for summary judgment as to all issues. On March 1, 2021, Plaintiffs filed their opposition under temporary seal and defendants filed their reply submission on April 5, 2021. As such, the parties' single, consolidated motion to seal pursuant to Local Civil Rule 5.3(c)(2) is currently due today, April 19, 2021. Although the parties are in the process of finalizing the motion to seal as required under the Rule, more time is required given the volume and nature of the materials containing sensitive and confidential information. Accordingly, plaintiffs respectfully request a one-week extension to file the parties' single, consolidated motion to seal pursuant to Local Civil Rule 5.3(c)(2) so that same shall be filed on or before April 26, 2021. Please be advised that the undersigned has conferred with defendants' counsel who has consented to the requested extension.

THE EPSTEIN LAW FIRM, P.A.

Page 2

We thank Your Honor in advance for your anticipated attention and cooperation in this matter.

Respectfully submitted,

/s/ Michael A. Rabasca

MICHAEL A. RABASCA

mrabasca@theepsteinlawfirm.com

MAR/me

Cc: Matthew E. Beck, Esq.
Mauro G. Tucci, Esq.